

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

In Re

Invictus Special Situations Master I, LP,  
Petitioner,

Petitioner, for an Order Pursuant to 28 U.S.C. §  
1782 to Conduct Discovery for Use in a Foreign  
Proceeding

CASE NO. 1:22-mc-00130-(ALC)

**DECLARATION OF MINYAO  
WANG IN SUPPORT OF INVICTUS  
SPECIAL SITUATIONS MASTER I,  
LP**

I, Minyao Wang, hereby declare under penalty of perjury pursuant to 28 U.S.C. § 1746(1), that the following is true and correct:

1. I am an attorney in good standing and licensed to practice law in the State of New York, and I am counsel of record for Invictus Special Situations Master I, LP (“**Invictus**”), petitioner in this proceeding. I have personal knowledge of the facts set forth in this declaration, which are true and correct, and if sworn as a witness, I could and would testify competently thereto.

2. I was engaged in the meet and confer process with counsel for Apollo Global Management, Inc. and Marc Rowan (“**Respondents**”) concerning the subpoenas Invictus served on them pursuant to 28 U.S.C. § 1782.

3. On or about July 28, 2022, I emailed Respondents a document containing Invictus’s proposed search terms and proposed custodians. On or about August 5, 2022, Respondents provided me with what they described as a “hit reports” based on my earlier proposal. The parties have had no substantial discussions about search terms or custodians since that date.

4. Invictus received two productions from Respondents, first on August 8, 2022, and again on September 8, 2022.

5. To the best of my knowledge, the documents in Respondents’ two productions were retrieved from an Apollo document repository maintained at the board of directors level.

I declare under penalty of perjury, that the foregoing is true and correct to the best of my knowledge.

Executed on December 20, 2022, at Staten Island, New York.



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Minyao Wang